

LOG OF WRITTEN COMMENTS SUBMITTED REGARDING RHNA

	Name/Organization	Date of Comment	General Category of Comment (e.g. RHNA Methodology, Process, Policy, Other)
1.	James Hartl, AICP, Acting Dir. Of Planning Los Angeles County Dept. of Regional Planning	08/08/06 (submitted as part of 09/28/06 Public Hearing by Julie Moore)	Methodology and Policy. Questions distribution of total regional number to local jurisdictions during last RHNA, and requests that Los Angeles County receive a fair regional housing needs allocation for this RHNA.
2.	Dennis Wilberg, City Manager City of Mission Viejo	09/20/06	Process. Provides suggestions regarding improving RHNA process.
3.	Dan Silver, Executive Director Endangered Habitats League	09/23/06	Methodology and Policy. Requests that housing allocations be directed "most efficiently" so as to reduce allocations where natural habitat/agricultural land is present, reduce allocation in unincorporated areas, increase them in municipalities and 2% areas.
4.	Michael D. Fitts, Staff Attorney Endangered Habitats League	09/25/06 (Supplemental Comment)	Methodology. Emphasizes that AB 2158 factors must be adequately incorporated into RHNA methodology and SCAG must disclose underlying data sources and assumptions regarding these factors.
5.	Mary Justice (member of the public) Resides in Thousands Oaks, CA	09/28/06	Other. Provides information about property owned by Ms. Justice in Riverside County which may be subject of a General Plan Amendment to reduce residential development.
6.	Chris Stephens, Planning Division Director, County of Ventura Resource Management Agency	10/03/06	Methodology. Provides information regarding local factors of the unincorporated Ventura County which would affect the RHNA methodology.
7.	Gail Lassoc, GSL Associates	10/11/06	Methodology. Seeks clarification on vacancy rates used by SCAG as part of RHNA methodology.
8.	Tracy Soto, Senior Planner, City of Anaheim	10/12/06	Methodology. Seeks clarification re. approaches to applying housing cost factor to RHNA (Item 6.1.1 of CEHD Subcommittee Agenda).



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



James E. Hartl, AICP
Director of Planning

August 8, 2006

TO: Mark Pisano, Executive Director
Southern California Association of Governments

FROM: James E. Hartl, AICP
Acting Director of Planning

SUBJECT: **RHNA ALLOCATION FOR UNINCORPORATED LOS ANGELES COUNTY**

In 2005 and 2006, the Los Angeles County Department of Regional Planning provided written feedback and an oral presentation to SCAG in response to the 2004 RTP projections. In order to continue the dialogue with SCAG to produce thorough and accurate projections for the Regional Housing Needs Assessment (RHNA), and in light of the proposed changes per the SCAG Pilot Program, the Los Angeles County Department of Regional Planning would like for SCAG to consider of the following concerns and observations for the unincorporated areas of Los Angeles County during the regional housing needs allocation process:

According to the April 2006 SCAG report entitled, *SCAG Housing Element Compliance and Building Permit Issuance in the SCAG Region*, the region exceeded its regional housing goals during the previous Housing Element planning period, between 1/1/1998-6/30/2005 (114%). However, only 95 out of 193 jurisdictions individually met their RHNA goals – yielding a deficit of 98 jurisdictions, or 51%, which did not. This suggests that the total regional goal on the whole is accurate, but the distribution of the total number among the local jurisdictions is not.

When considering the appropriateness of the RHNA allocation for unincorporated Los Angeles County, it is necessary to consider that despite the many accomplishments that the County has achieved in promoting the production and preservation of housing in the unincorporated areas, the County has only achieved 44% of its RHNA allocation during the 1/1/1998-6/30/2005 Housing Element planning period. The table below compares the RHNA allocation for unincorporated Los Angeles County with the actual amount of housing units constructed during this past Housing Element planning period.

SCAG RHNA Allocation for Unincorporated Los Angeles County		
RHNA Total Construction Need	New Housing Units Permitted 1/98 - 6/05	Building Permit Issuance as a % of Total Construction Need
52,202	23,008	44%

Source: 2006 SCAG Housing Element Compliance and Building Permit Issuance in the SCAG Region

RHNA allocation of 52,202 units illustrates that other market factors are at work that are non-regulatory in nature and not under the County's control.

It is our hope to work closely with your staff to develop the next RHNA and for the County to receive a fair regional housing needs allocation for the next Housing Element planning period. To this end, we are enclosing some suggested changes to the SCAG Pilot Program for your consideration. We look forward to working with you and your staff.

Should you have any questions, please contact Julie Moore of my staff at (213) 974-6425.

JEH:JTM:kd

Attachment: Redlined version of proposed language for Section 65584.02 of the Government Code

SCAG PROPOSED RHNA PILOT PROJECT LANGUAGE
(with suggested changes from Los Angeles County)

Add Section 65584.02.5 to the Government Code to read:

65584.02.5.(a) For the fourth revision of the housing element pursuant to Section 65588 within the region of the Southern California Association of Governments (SCAG), the existing and projected need for housing for the region as a whole and for each member jurisdiction within the region shall be determined according to the provisions of this article. SCAG shall determine ~~prepare the fourth revision of the Housing Element Regional Housing Needs Assessment the existing and future regional housing need,~~ in accordance with the following:

- (1) Develop an integrated long-term growth forecast, by 5 year increments, to determine existing and future regional housing need.
- (2) The forecast shall include three major variables: population, employment, and households by geographic area throughout the region.
- (3) SCAG shall convert households into housing units using replacement rates from the Department of Finance (~~DOF~~), and county level vacancy rates from the most recent Census, by weighing vacancy rates of for-sale and for-rent units.
- (4) ~~(b)~~ SCAG shall consider the factors specified in ~~Government Code Sections 655084.04(d)-paragraph (1), subparagraphs (A)(B)(C) of paragraph (2)(A-C), and paragraphs (3),(5), and (9) of subdivision (d) of Section 65584.04,~~ early in the growth forecast process, and ~~shall not be required to survey its member jurisdictions pursuant to subdivision (b) of Section 65584.04.~~
- (4) ~~(5)~~ SCAG shall approve and transmit the forecast, ~~and transmit it to the State Housing and Community Development Department (HCD) at the regional level with the following variables: population, households, employment and housing units.~~
- (5) ~~(6)~~ If the total regional population forecast for the planning period, developed by SCAG ~~and used for the preparation of the regional transportation plan,~~ is within a range of four ~~(4)~~ percent of the total regional population forecast for the planning period over the same time period by the Department of Finance (~~DOF~~), then the ~~population forecast developed by SCAG shall be the basis from which the department determines the existing and projected need for housing in the region.~~
- (6) ~~(7)~~ If the difference between SCAG's ~~population projection forecast~~ and the ~~forecast one projected by the DOF Department of Finance~~ is over four (4) percent, the ~~California Department of Housing and Community Development (HCD)~~ may convene a ~~Ppanel~~ consisting of representatives from the Department of Finance (DOF), the Employment Development Department (EDD), Caltrans the Department of Transportation and a representative of another Council Of Governments (COG) ("Panel") to review the assumptions and methodology of the forecast and to recommend to the department HCD whether or not the ~~household forecasts and assumptions they~~ are consistent with this section ~~or require modifications.~~
- (7) ~~(8)~~ Upon review of the recommendations of the Panel and consultation with SCAG, the department HCD shall either certify the SCAG forecast, ~~or shall certify the forecast determined by the Panel, or shall submit a written proposal for propose an alternative determination of existing and future regional housing need regional housing need, with a~~



City of Mission Viejo

Office of the City Manager

Lance R. MacLean
Mayor
Frank Ury
Mayor Pro Tempore
Trish Kelley
Council Member
John Paul "J.P." Ledesma
Council Member
Gail Reavis
Council Member

September 20, 2006

Ms. Ma'Ayn Johnson
Assistant Regional Planner
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, California 90017-3435

Dear Ms. Johnson:

RE: SCAG Public Hearing/Workshop on the Integrated Regional Forecast and Regional Housing Needs Assessment (RHNA) Methodology: September 28, 2006

The City of Mission Viejo appreciates receipt of the public notice for the upcoming 9/28/2006 public hearing and workshop on SCAG's proposed integration of its regional forecast with the development of the fourth cycle of the Regional Housing Needs Assessment (RHNA) process, as well as the breadth of background information that has been made available through your Agency's website for the workshop's discussion. Mr. Charles Wilson, Community Development Director for the City of Mission Viejo, will be attending the RHNA workshop and advising the City of key issues that are discussed.

The City of Mission Viejo also appreciates the opportunity to provide written comments for consideration and discussion at the public hearing/workshop. As you are well aware, the City of Mission Viejo, as with all other local jurisdictions in the SCAG region, recognize the significant amount of work that must be accomplished by SCAG, the subregions, and the individual cities and counties, to allow each jurisdiction to successfully adopt a revised Housing Element by June 30, 2008.

With this deadline in mind, the City of Mission Viejo respectfully offers these comments and considerations for the RHNA public hearing/workshop:

- 1) Do we know when the state Department of Housing and Community Development (HCD) will issue its numbers for the existing and projected regional housing need for the SCAG region, to compare against the SCAG draft forecast? And will SCAG's forecasts be within an acceptable target of HCD's housing need numbers, for SCAG to then develop a housing allocation number for each individual jurisdiction by December 1, 2006? If HCD's numbers are significantly at variance with the SCAG numbers, what



happens to the RHNA process and timeframes, and what are the opportunities for local government input on the HCD numbers?

- 2) How can SCAG quickly communicate RHNA information to all local jurisdictions, so that we are individually aware of new information that becomes available, tasks that must be completed, meetings that we should attend, RHNA timeframes that may be modified, or technical and policy decisions that are under consideration? For example, could an electronic mailing list be developed of all local jurisdiction contacts, for SCAG to use to disseminate updated and new RHNA information?
- 3) Could SCAG develop an information sheet, or expand the existing RHNA timeline, to identify all available opportunities and associated dates and deadlines for local jurisdiction input on forecasts and RHNA components such as: the draft RHNA methodology; the forecasts for population, housing, households and employment at the local jurisdiction traffic analysis zone and citywide levels; the Compass Blueprint growth pattern; the housing need allocation numbers; trades and transfers opportunities; and, most important, when and how a local jurisdiction can request adjustments to the forecasts, the distribution of housing and employment, and/or the allocation of housing need, at the local jurisdiction level?
- 4) What is the deadline for comment on SCAG's RHNA methodology, recognizing that some of the methodology is provided in the workshop packet, and some of the methodology is still under development?
- 5) Is the subregion's workshop date for the growth forecasts, also the deadline date for formal comment by individual jurisdictions on the growth distributions within their jurisdiction and/or within the county? If not, is there a specific deadline for such comments?
- 6) Separate from the subregional workshops on the growth forecasts for each subregion, can an individual jurisdiction meet separately with SCAG staff to discuss its comments and input to the forecasts and/or its housing need allocation numbers, accompanied by a written comment letter?

I realize, Ma'Ayn, that the questions raised in this letter of comment are broad in scope, but the answers and information provided will greatly assist local jurisdictions in understanding the specific points in time when local government should submit responses or input on the different RHNA issues, and when to allocate the appropriate resources to provide input and comments.

I also recognize that certain work efforts, such as development of the RHNA methodology, are underway. Through this letter, the City respectfully requests notification of the review opportunity for the RHNA methodology, as outlined in statute, and the ability to provide further comment as the technical and policy issues on methodology are developed by SCAG committees.

An additional comment relates to the statutory deadline for adopted Housing Elements. The City of Mission Viejo appreciates that the draft RHNA timeline included in the workshop packet

identifies that SCAG would complete a final housing need allocation plan by June 8, 2007, thereby allowing local jurisdictions to have a one-year timeframe to prepare and complete their Housing Element updates.

The City of Mission Viejo also recognizes the significant amount of work that must be conducted between now and June 8, 2007 for SCAG to complete the region's final housing need allocation plan. If the RHNA issues and planning processes take much longer than anticipated, does HCD have the authority to consider granting an extension to the June 30, 2008 deadline for local jurisdiction adoption of revised Housing Elements? And is there a process by which such an extension could be requested?

Thank you for your consideration of these comments. We look forward to the September 28, 2006 public hearing and workshop on the Fourth Cycle of the RHNA process, and to the receipt of responses to our questions. Please contact Chuck Wilson, Director of Community Development, at 949/470-3024, or via email at cwilson@cityofmissionviejo.org, should you seek further clarification on our inquiries.

Respectfully,



Dennis R. Wilberg,
City Manager

cc: City Council
Planning and Transportation Commission
City Attorney
Assistant City Attorney
Director of Community Development
Planning Manager
OCCOG Board of Directors
OCCOG Technical Advisory Committee
OCCOG Regional Issues Consultant

ENDANGERED HABITATS LEAGUE

DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE



Sept. 23, 2006

Ma'Ayn Johnson
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

**RE: Integrated Regional Growth Forecast and Regional Housing Needs
Assessment (RHNA) Methodology**

Dear Ms. Johnson:

The Endangered Habitats League (EHL) appreciates the opportunity to provide comments on the RHNA process. We urge that the issues raised be discussed at the workshop. A written response would also be appreciated.

As you know, the following provisions of law (from AB 2158) must be applied:

- (d) The regional housing needs allocation plan shall be consistent with all of the following objectives:
 - (1) Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low and very low income households.
 - (2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns.
 - (3) Promoting an improved intraregional relationship between jobs and housing.
 - (4) Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent decennial United States census.

In addition, the following factors must be incorporated into the original methodology, and not only utilized during the appeals process:

- (d) To the extent that sufficient data is available from local governments pursuant to subdivision (b) or other sources, each council of governments, or delegate subregion as applicable, shall include the following factors to develop the methodology that allocates regional housing needs:
 - (1) Each member jurisdiction's existing and projected jobs and housing relationship.
 - (2) The opportunities and constraints to development of additional

housing in each member jurisdiction, including all of the following:

(A) Lack of capacity for sewer or water service due to federal or state laws, regulations or regulatory actions, or supply and distribution decisions made by a sewer or water service provider other than the local jurisdiction that preclude the jurisdiction from providing necessary infrastructure for additional development during the planning period.

(B) The availability of land suitable for urban development or for conversion to residential use, the availability of underutilized land, and opportunities for infill development and increased residential densities. The council of governments may not limit its consideration of suitable housing sites or land suitable for urban development to existing zoning ordinances and land use restrictions of a locality, but shall consider the potential for increased residential development under alternative zoning ordinances and land use restrictions.

(C) Lands preserved or protected from urban development under existing federal or state programs, or both, designed to protect open space, farmland, environmental habitats, and natural resources on a long-term basis.

(D) County policies to preserve prime agricultural land, as defined pursuant to Section 56064, within an unincorporated area.

Currently, the region utilizes land extremely inefficiently. General plans call for the subdivision of vast tracts of rural and agricultural lands into estate lots and ranchettes, irrespective of natural or agricultural values. This wasting of land – which comes with the high cost of inefficient service provision – is unacceptable. Urban land, with existing urban services, is underutilized. The consequence is severe stress on the transportation system. For example, the “2%” areas along major transportation corridors identified in the Regional Comprehensive Plan are, in most cases, not being developed to their potential.

The methodologies used to implement the above provisions of law should be based upon the following, in order to direct housing allocations most efficiently:

- Reduce allocations where important natural habitat or agricultural land is present. Such areas may be identified through existing habitat programs, through the SCAG Open Space element, or other means.
- Reduce allocations in unincorporated areas and increase them in municipalities.
- Increase allocations in 2% areas.

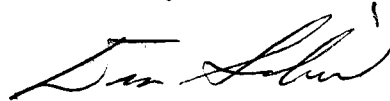
A number of cities and counties in California have entered into creative agreements to ensure that housing is built in the most suitable areas – typically municipalities where services already exist and a mix of higher densities can be accommodated.¹ In order to achieve that objective, incentives should be identified to facilitate development of the most suitable land, including, but not limited to:

¹ Solano and Napa counties, for example, entered into joint planning processes with their cities, which resulted in directing units originally assigned to the county unincorporated lands to cities. Kings County and a few others have adopted joint housing elements for the County and its cities.

voluntary pass through or tax sharing agreements (property and sales tax)²; preference for infrastructure funding³; and other creative agreements between cities and counties. Regulatory relief, as mentioned in the staff report, should also be explored as a means of supporting superior outcomes.

Please keep EHL informed of your progress on the RHNA methodologies.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Silver", with a stylized flourish at the end.

Dan Silver
Executive Director

cc: Mark Pisano
Hasan Ikharta

² Unincorporated area need for tax base often results in development occurring in the least suitable locations. Tax sharing can help offset the loss of tax base to counties as development is directed to the cities.

³ A second major barrier to locating housing in infill areas is lack of infrastructure financing to support higher density and replace outdated infrastructure. Options for directing additional infrastructure financing to infill areas should be identified.

ENDANGERED HABITATS LEAGUE

DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE



BY FAX AND U.S. MAIL

Sept. 25, 2006

Ma'Ayn Johnson
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

**RE: Integrated Regional Growth Forecast and Regional Housing Needs Assessment
(RHNA) Methodology**

Dear Ms. Johnson:

The Endangered Habitats League (EHL) appreciates the opportunity to provide additional comments on the RHNA process. In an earlier letter dated September 23, 2006, EHL exhorted SCAG to faithfully apply the factors spelled out in Government Code section 65584.04, subdivision (d) in developing a methodology to govern the Regional Housing Needs Assessment process for the region. If applied properly, the RHNA methodology for the region should result in elimination or reduction of allocations in open space, agricultural and habitat areas, reduced allocations in unincorporated areas, and maximal allocations in areas slated for intensive development under the 2% strategy.

State law requires that consideration of these factors in developing a methodology be more than just a theoretical or casual exercise. Rather, a detailed factual investigation of the feasibility of applying each factor to the maximum extent practicable must be made, backed by a reasoned explanation why such application is or is not feasible.

Government Code section 65584.04 requires a written explanation concerning each factor, including how it was used in developing the methodology. Subdivision (e) provides:

"The council of governments, or delegate subregion, as applicable, shall explain in writing how each of the factors described in subdivision (d) was incorporated into the methodology and how the methodology is consistent with subdivision (d) of Section 65584." (Cal. Gov't Code § 65584.04, subd. (e), emphasis added.)

Subdivision (d) requires the employment of all available data in applying the 2158 factors. The subsection prefaces a listing of the factors with the following language:

"To the extent that sufficient data is available from local governments pursuant to subdivision (b) or other sources, each council of governments, or delegate subregion as applicable, shall include the following factors to develop the methodology that allocates regional housing needs . . . " (Cal. Gov't Code § 65584.04,

Ma'Ayn Johnson, SCAG
Supplemental EHL Comments on RHNA Methodology
September 25, 2006
Page 2

subd. (d), emphasis added.)

Subdivision (c) also assumes that relevant factual inquiries will be made in addressing each factor:

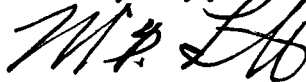
“The proposed methodology, along with any relevant underlying data and assumptions, and an explanation of how information about local government conditions gathered pursuant to subdivision (b) has been used to develop the proposed methodology, and how each of the factors listed in subdivision (d) is incorporated into the methodology, shall be distributed to all cities, counties, any subregions, and members of the public who have made a written request for the proposed methodology.” ” (Cal. Gov’t Code § 65584.04, subd. (c) emphasis added.)

These statutory references to available data and to required explanations manifest the Legislature’s intention that the consideration of these factors be more than just paperwork. The statutory language italicized above –not to mention the factors themselves–would not make sense, and would be reduced to mere surplusage, were it permissible to apply each factor without a detailed factual investigation into the feasibility of incorporating each 2158 factor into the RHNA methodology to the maximum possible extent. State law also requires that these efforts be described in sufficient written detail, including disclosure of all data sources and assumptions, so that the public can measure the adequacy of the effort to incorporate each factor into the RHNA methodology.

Having undertaken the RHNA methodology development process outlined in section 65584.04, SCAG has a mandatory duty to apply each factor in the manner outlined above, and to provide a detailed written explanation demonstrating compliance. This obligation is judicially enforceable by ordinary mandamus (See Cal. Code Civ. Proc. § 1085; *Hoffmaster v. City of San Diego* (1997) 55 Cal.App.4th 1098, 1111 [“substantial compliance” with housing element mandates is a question of law over which courts exercise their independent judgment].)

EHL looks forward to participating in the process of developing the RHNA methodology in a manner which addresses critical housing needs consistent with responsible and sustainable planning and resource conservation.

Very truly yours,



Michael D. Fitts
Staff Attorney

cc: Mark Pisano
Hasan Ikhrata

Comment for PUBLIC HEARING - September 28, 2006

To:
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

From: Mary Justice
3998 Avenida Verano
Thousand Oaks, CA
91360

Riverside County has at least 1.1 million acres on which home building is being denied or drastically reduced because of a recent General Plan Amendment (GPA) and a proposed Coachella Valley MSHCP (CVMSHCP). The rationale for these limitations to housing is based on false "scientific" data.

My land has gone from 90-180 dwelling units to 6 dwelling units to zero dwelling units. On December 19, 1989 my 30 acres (APN: 651-030-004) was zoned for between 90 and 180 dwelling units.. 10 acres of my land was zoned 2A (5-8 DU/AC) and 20 acres was zoned 2B (2-5 DU/AC). After the General Plan Amendment (RCIP) was adopted 2 years ago my 30 acres was zoned for 1 DU/5AC. Two buyers who contacted the head of the Coachella Valley Fringe Toed Lizard (CVFTL) Preserve to the east of my land were told there would never be any building on my land. Fortunately I have letters to this effect.

On the December 19, 1989 print of the Western Coachella Valley Plan my land is **not** identified as desert, mountainous area, wildlife/vegetation, water resources or adopted specific plans. It is simply buildable land north of I-10 highway just east of Thousand Palms. In August 2000 we were told the CVFTL needed sand which blows across our land towards the CVFTL Preserve. Previously the sand was identified as coming from Thousand Palms Canyon area east of us.

On September 14, 2006 Mr. Sullivan of CVAG showed an areal photograph of my area and declared that it was "obvious" that the very particular kind of sand needed to be blown onto the CVFTL Preserve came from the hills behind my property. Studies conducted on the ground by Simons, Li & Associates, consultants to the Army Corps of Engineers and others contradict Mr. Sullivan's opinion. The studies that actually measure things on the ground determined that only 5-10 percent of the particular size sand needed by the Preserve comes from the huge area northeast of the Preserve which includes my land.

The areal photograph shown by Mr. Sullivan is a picture of sand that has for the most part become cemented into place. When one looks at Ramon Road in my area of Thousand Palms there is very little sand. The measurements on the ground by reputable scientists confirm this.

The conservation minded people are preserving land that in large part has neither endangered species nor a particular size of sand blowing across it. The General Plan Amendment and the CVMSHCP are anti home building measures which protect a massive bureaucracy. It protects bureaucrats not species.

Sincerely, Mary Justice 3998 Avenida Verano, Thousand Oaks, CA 91360 (877)692-8214

Mary Justice

October 3, 2006

Lynn Harris, Manager
Community Development Division
Southern California Association of Governments
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017

SUBJECT: Local Factors of Ventura County Affecting the Methodology for
Housing Distribution (Government Code Section 65584.04(d))

According to Government Code Section 65584 (Methodology for Housing Distribution) each council of governments shall request information from its member jurisdictions regarding the factors listed in subdivision (d) that will allow for the development of a methodology that allocates regional housing needs. Attached you will find our comments with supporting maps and documents to the factors listed in subdivision (d) of Section 65584.

If you have any questions regarding the information presented, please contact Bruce Smith at (805) 654-2497.

Sincerely,


Chris Stephens, Director
Planning Division

Attachment: Local Factors of Unincorporated Ventura County Affecting the Methodology for Housing Distribution.

cc: Joe Carreras
Frank Wen
Wally Bobkiewicz, Santa Paula/VCOG



**Local Factors of Unincorporated Ventura County Affecting the
Methodology for Housing Distribution
(Government Code Section 65584.04(d))**

Listed below are the local factors that are listed in section 65584.04(d) of the Government Code (in **bold**) that are to be used to develop the methodology that allocates regional housing needs. Under each of these factors is information pertinent to the unincorporated area of Ventura County:

(1) Each member jurisdiction's existing and projected jobs and housing relationship.

The following table compares the projected employment/dwelling unit forecast ratios (Ventura County General Plan *Land Use Appendix*). See map figure 3.5 to view area boundaries.

Table 3.4.2, Employment/Housing Forecast Ratios

Area	Estimate 2000	Forecast 2005	Forecast 2010	Forecast 2015	Forecast 2020
Camarillo Area	1.41	1.32	1.26	1.25	1.23
(Camarillo City)	(1.43)	(1.39)	(1.32)	(1.31)	(1.32)
Fillmore Area	1.00	1.03	1.05	1.02	0.99
(Fillmore City)	(0.94)	(0.98)	(1.01)	(0.97)	(0.96)
Las Posas Area	1.23	1.11	1.08	1.05	1.02
Moorpark Area	0.84	0.97	1.17	1.33	1.06
(Moorpark City)	(0.83)	(0.97)	(1.18)	(1.34)	(1.05)
North Half Area	0.07	0.11	0.12	0.13	0.13
Oak Park Area	0.16	0.16	0.16	0.17	0.18
Ojai Area	0.59	0.55	0.53	0.52	0.50
(Ojai City)	(1.12)	(1.12)	(1.12)	(1.10)	(1.08)
Oxnard Area	1.44	1.45	1.39	1.39	1.39
(Oxnard City)	(1.15)	(1.18)	(1.13)	(1.16)	(1.18)
Piru Area	0.66	0.58	0.58	0.57	0.57
Port Hueneme Area	2.06	2.04	2.08	2.11	2.14
(Port Hueneme City)	(2.09)	(2.02)	(2.04)	(2.07)	(2.10)
Santa Paula Area	1.03	0.99	1.02	1.03	1.05
(Santa Paula City)	(0.82)	(0.81)	(0.84)	(0.87)	(0.89)
Simi Valley Area	0.88	0.95	1.05	1.17	1.28
(Simi Valley City)	(0.91)	(0.98)	(1.09)	(1.21)	(1.32)
Thousand Oaks Area	1.55	1.63	1.64	1.69	1.78
(Thousand Oaks City)	(1.63)	(1.66)	(1.69)	(1.76)	(1.85)
Ventura Area	1.46	1.49	1.49	1.53	1.59
(Ventura City)	(1.45)	(1.48)	(1.48)	(1.53)	(1.60)
Ahmanson Ranch Area	0.00	0.00	0.00	0.00	0.00
(Incorporated Total)	(1.29)	(1.31)	(1.33)	(1.38)	(1.41)
(Unincorporated Total)	(1.21)	(1.15)	(1.12)	(1.07)	(1.06)
Ventura County Total	1.28	1.29	1.30	1.34	1.36

(Numbers in Parentheses) = City numbers

(2) The opportunities and constraints to development of additional housing in each member jurisdiction, including all of the following:

(A) Lack of capacity for sewer or water service due to federal or state laws, regulations or regulatory actions, or supply and distribution decisions made by a sewer or water service provider other than the local jurisdiction that preclude the jurisdiction from providing necessary infrastructure for additional development during the planning period.

Domestic Water Constraints:

Domestic water supply/distribution facilities in the unincorporated area of Ventura County are generally provided by: 1) individual property owners using private wells, or 2) water purveyors using well water, surface water, and/or water imported to Ventura County by a water wholesaler.

The Santa Monica Mountains is a 17,175 acre, Open Space-designated area that does not have access to imported water or sufficient ground or surface water (Ventura County General Plan Land Use Appendix, Section 3.3.5 Housing Constraints). See Water & Sewage Constraints map below.

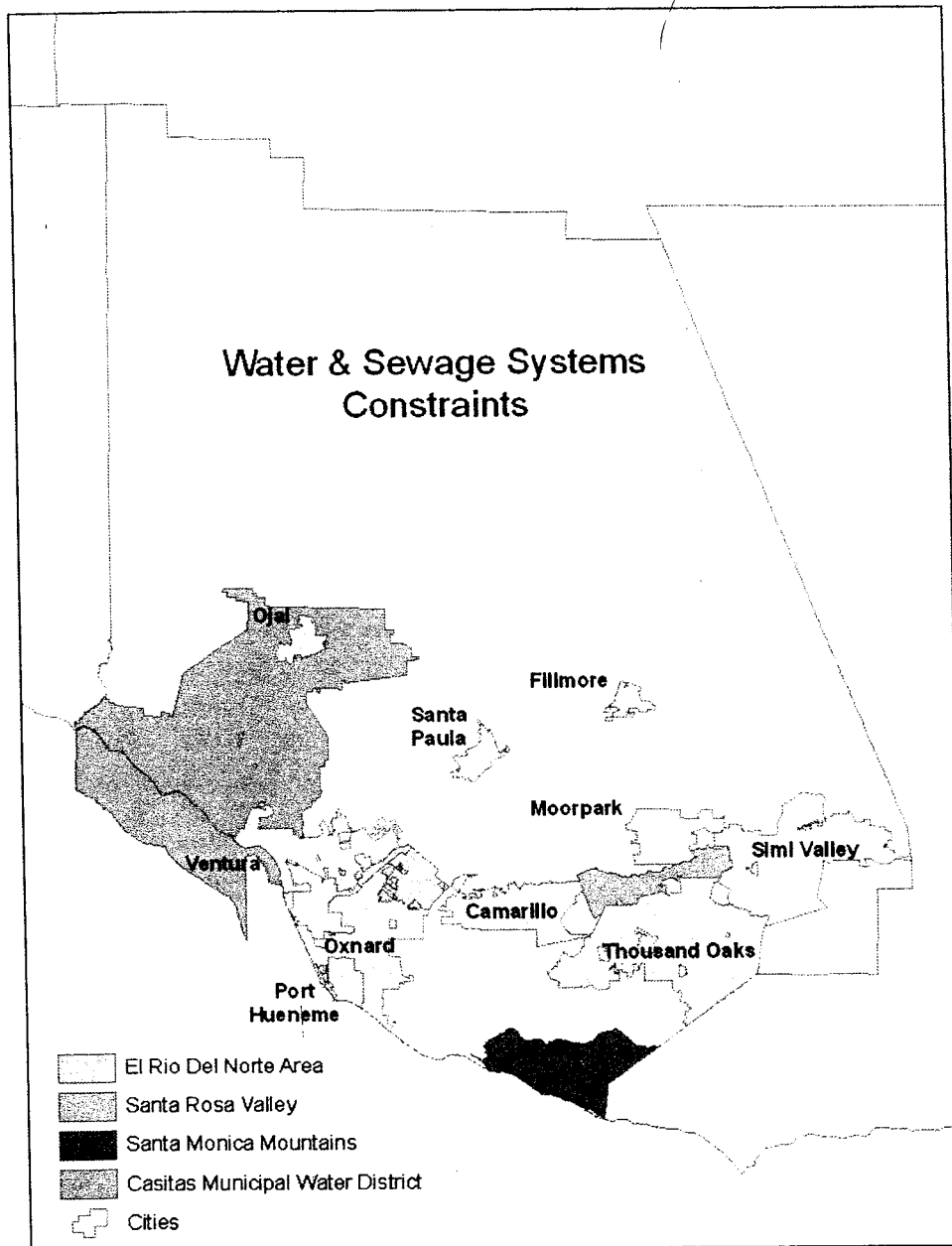
The Casitas Municipal Water District (CMWD) has a policy to manage its water supplies at a safe yield. Section 4.1 of the CMWD Ordinance on Rates and Regulations for Water Service, adopted January 9, 2002 provides the authority to issue service when water supplies are available. CMWD staff has reported that the current allocation is 25 acre feet every one and a half years, and there is currently a waiting list for new customers. See map below.

It should be noted that the Ventura County LAFCO strictly adheres to section 56133 of the Government Code regarding the extension of city water service without annexation (see attach).

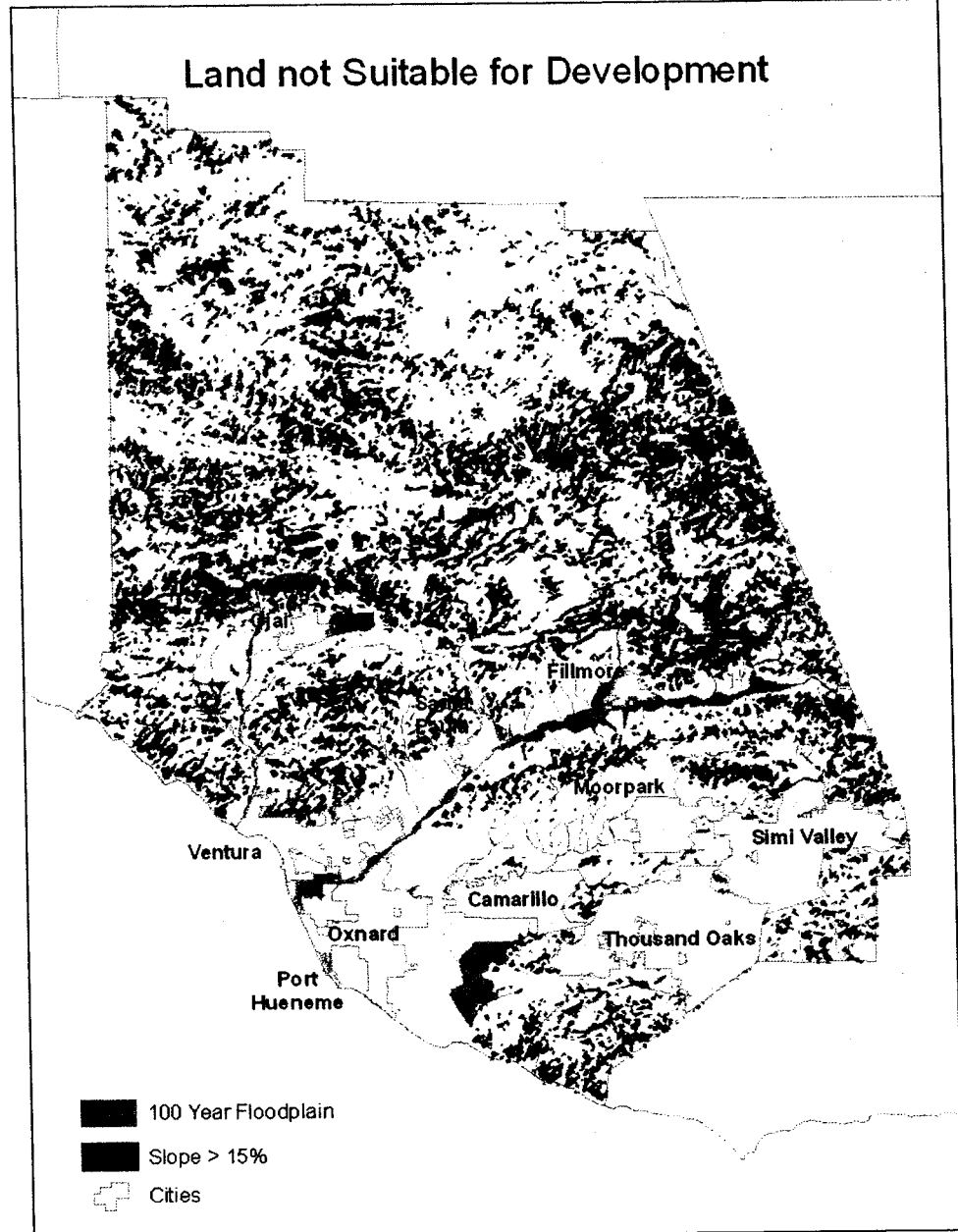
Sewage Collection/Treatment Constraints:

Sewage collection/treatment in the unincorporated area of Ventura County is provided by community sewer systems, on-site sewage treatment plants, or individual sewage disposal systems. Community sewer systems currently serve unincorporated urban centers (i.e., Piru) and portions of many Existing Communities (i.e., Bell Canyon, Camarillo Heights, Las Posas Estates, Montalvo, Nyeland Acres, North Ventura Avenue, Ojai Valley, Santa Susanna Knolls, Saticoy, Ventu Park) [Figure 3.6 Ventura County General Plan *Goals, Policies and Programs*, see attached map]. There are two areas within Ventura County that are affected by sewage system constraints, which are described below:

El Rio/Del Norte is a 6,841 acre area (see Water & Sewage Constraints map below). Due to existing nitrate contamination of groundwater, the Regional Water Quality Control Board (RWQCB) adopted a policy in August of 1999 that prohibits any new septic systems in the El Rio/Del Norte area and requires sewers by January 1, 2008 (Ventura County Public Works Water & Sanitation Services). Sewer treatment is planned to be provided by the City of Oxnard for existing land uses only. (Ventura



Land not Suitable for Development

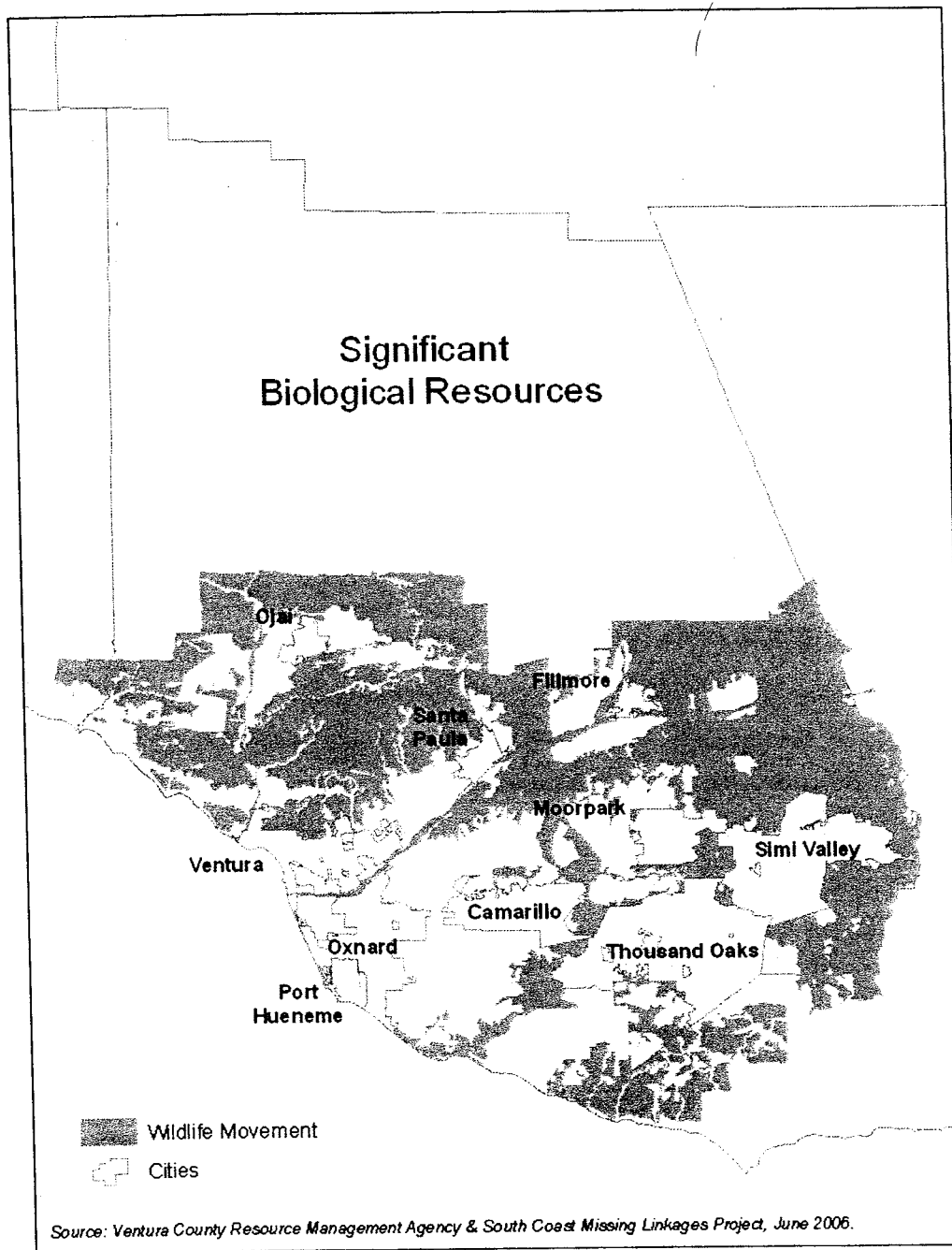


(C) Lands preserved or protected from urban development under existing federal or state programs, or both, designed to protect open space, farmland, environmental habitats, and natural resources on a long term basis.

1. Government owned land, including conservation agencies authorized by the State, within the unincorporated area of Ventura County encompass 639,635 acres (Ventura County parcel records, September 2006). See map below. It should be noted that the State acquired Ahmanson Ranch in October of 2003 to prevent urban development and to preserve it in its natural state. At that time, Ahmanson Ranch represented 33 percent of the total urban residentially zoned land within the unincorporated area of Ventura County. Moreover, SCAG's 2004 RTP did not reflect the fact that Ahmanson Ranch had been acquired by the State.
2. Also known as the Williamson Act, the Land Conservation Act (LCA) program is a contract between the County and qualifying landowners that restricts contracted land to agricultural uses for either a 10 or 20 years. As of January 1, 2006, LCA contracts covered approximately 130,876 acres of unincorporated land (2006 Ventura County LCA map). See reference map below.
3. Mineral Resource Protection Zones cover approximately 21,137 acres of unincorporated land (see reference map below). The purpose of these zones includes:
 - To safeguard future access to an important resource
 - To facilitate a long term supply of mineral resources within the County
 - To minimize land use conflicts
 - To provide notice to landowners and the general public of the presence of the resource (Sec. 8104-7.2 of the Ventura County Non-Coastal Zoning Ordinance).
4. Biological resources in Ventura County include plant and animal species and their habitats, plant communities and ecosystems. In addition to the Federal and State regulations protecting these resources, the County General Plan contains the following goals and policies regarding biological resources (see Significant Biological Resources map below):

"1.5.1 Biological Resource Goal:

Preserve and protect significant biological resources in Ventura County from incompatible land uses and development. Significant biological resources include *endangered, threatened or rare species* and their habitats, *wetland habitats, coastal habitats, wildlife migration corridors* and *locally important species/communities*.



To view the National Wetlands Inventory map for Ventura County, please go to the following website:

http://www.ventura.org/planning/programs_services/bio_resources/bio_resources.htm

6. Based on the review and recommendation of a qualified biologist, the design of road and floodplain improvements shall incorporate all feasible measures to accommodate wildlife passage.”
5. In 1976, the California Legislature enacted the Coastal Act, which created a mandate for coastal counties to manage the conservation and development of coastal resources through a comprehensive planning and regulatory program called the Local Coastal Program. Ventura County’s Coastal Area Plan and the Coastal Zoning Ordinance together constitute the "Local Coastal Program" (LCP) for the unincorporated portions of Ventura County’s coastal zone.

For additional information and to view the Local Coastal Plan map, please go to the following website:

http://www.ventura.org/planning/programs_services/local_coast/local_coast.htm

(D) County policies to preserve prime agricultural land as defined pursuant to Section 56064, within an unincorporated area.

The Ventura County General Plan includes an Agricultural designation (see map below), which is applied to irrigated lands which are suitable for the cultivation of crops and orchards. The County General Plan contains the following goals and policies regarding Agricultural designated land and farmland resources:

“3.2.1-4 *Agricultural Goals:*

- (1) Identify the *farmlands* within the County that are critical to the maintenance of the local agricultural economy and which are important to the State and Nation for the production of food, fiber and ornamentals.
- (2) Preserve and protect agricultural lands as a nonrenewable resource to assure their continued availability for the production of food, fiber and ornamentals.
- (3) Maintain agricultural lands in parcel sizes which will assure that viable farming units are retained.
- (4) Establish *policies* and regulations which restrict agricultural land to farming and related uses rather than other *development* purposes.
- (5) Restrict the introduction of conflicting uses into farming areas.

“3.2.2-4 *Agricultural Policies:*

- (1) The Agricultural land use designation shall primarily include lands which are designated as *Prime Farmlands*, *Farmlands of Statewide Importance* or *Unique Farmlands* in the State’s Important Farmland Inventory (IFI), although land may not be designated Agricultural if small areas of agricultural land are isolated from larger blocks of farming land (in such cases, the agricultural land is assigned to the Open Space or Rural designation of the surrounding properties).

To view a detailed map of the Ventura County General Plan, see the following link:

http://www.ventura.org/planning/pdf/gpp_pdfs/Goals_Policies_Programs_6_30_06.pdf

“1.6.1 Farmland Resources Goals:

1. Preserve and protect irrigated agricultural lands as a nonrenewable resource to assure the continued availability of such lands for the production of food, fiber and ornamentals.
2. Encourage the continuation and development of facilities and programs that enhance the marketing of County grown agricultural products.”

“1.6.2 Farmland Resources Policies:

1. *Discretionary development* located on land designated as Agricultural (see Land Use Chapter) and identified as *Prime Farmland* or *Farmland of Statewide Importance* on the State's Important Farmland Inventory, shall be planned and designed to remove as little land as possible from potential agricultural production and to minimize impacts on topsoil.
2. Hillside agricultural grading shall be regulated by the Public Works Agency through the Hillside Erosion Control Ordinance.
3. Land Conservation Act (LCA) Contracts shall be encouraged on irrigated farmlands.
4. The Public Works Agency shall plan transportation capital improvements so as to mitigate impacts to important farmlands to the extent feasible.
5. The County shall preserve agricultural land by retaining and expanding the existing *Greenbelt Agreements* and encouraging the formation of additional *Greenbelt Agreements*.
6. *Discretionary development* adjacent to Agricultural-designated lands shall not conflict with agricultural use of those lands.

As of September 2006, the Ventura County General Plan includes approximately 89,824 acres of land designated as Agricultural (Ventura County General Plan Goals, Policies and Programs, Figure 3.1 General Land Use Map).

(5) Agreements between a county and cities in a county to direct growth toward incorporated areas of the county.

The “*Guidelines for Orderly Development*” is an agreement adopted by the Ventura County Board of Supervisors, all City Councils within Ventura County and the Ventura County Local Agency Formation Commission (LAFCO). They refine the guidelines originally adopted in 1969 and maintain the consistent theme that urban development should be located within incorporated cities, whenever and wherever practical. (See “*Guidelines for Orderly Development*” attachment and/or website below)

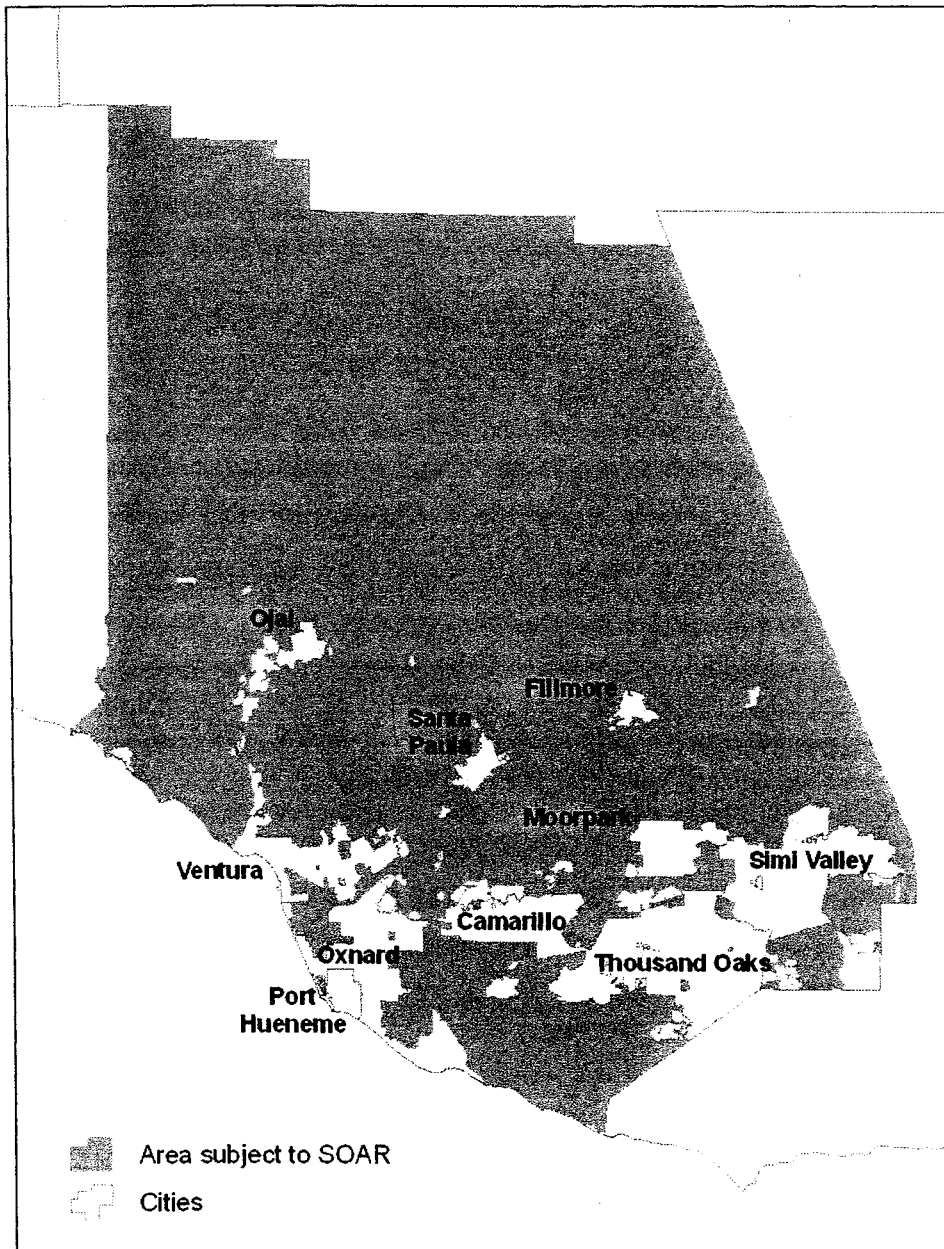
http://www.ventura.org/planning/pdf/brochures/guideline_orderly_dev8_06.pdf

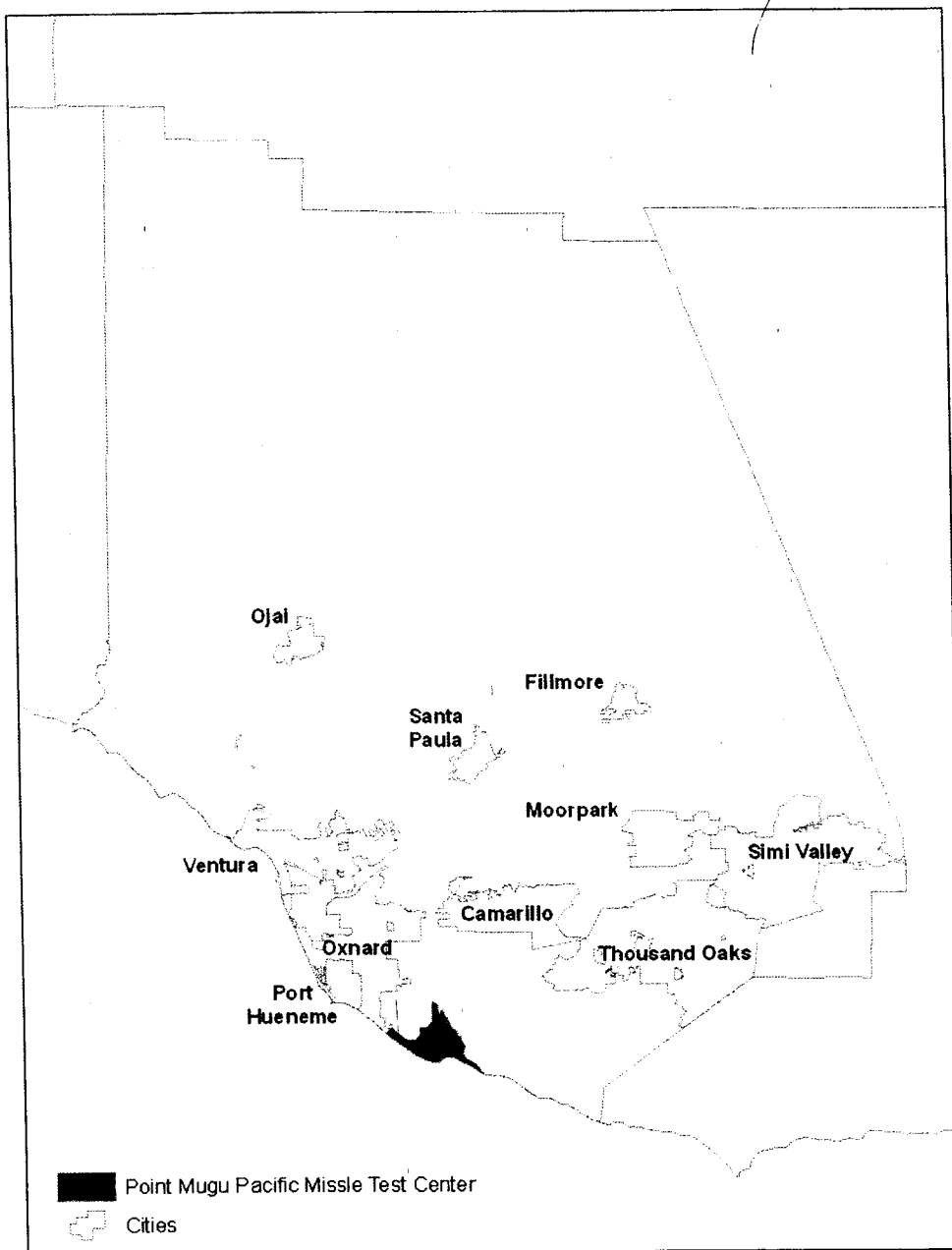
Ventura County General Plan policy 3.1.2-11 reads as follows:

“*Discretionary development* shall be consistent with the *Guidelines for Orderly Development*.”

regional housing needs”, Ventura County does not believe that this section applies to the Ventura County SOAR Ordinance for the following reasons:

- The SOAR Ordinance does not directly or indirectly limit the number of residential permits issued by the County
- The SOAR Ordinance only affects General Plan amendments or changes of policy on land currently designated Agricultural (see 2.D. above), Open Space, or Rural.





CALIFORNIA GOVERNMENT CODE SECTION 56133

As of January 1, 2006

56133. (a) A city or district may provide new or extended services by contract or agreement outside its jurisdictional boundaries only if it first requests and receives written approval from the commission in the affected county.

(b) The commission may authorize a city or district to provide new or extended services outside its jurisdictional boundaries but within its sphere of influence in anticipation of a later change of organization.

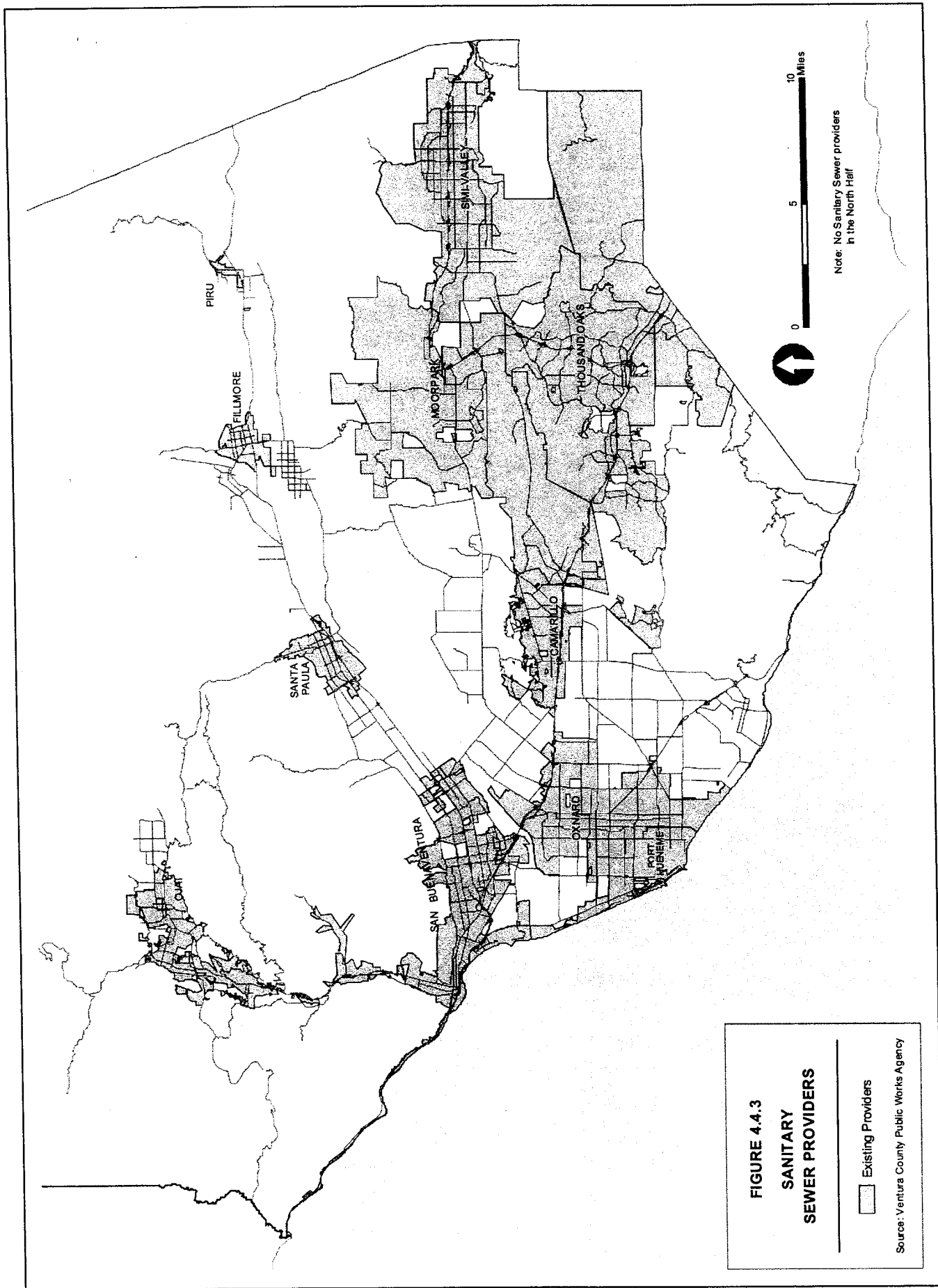
(c) The commission may authorize a city or district to provide new or extended services outside its jurisdictional boundaries and outside its sphere of influence to respond to an existing or impending threat to the public health or safety of the residents of the affected territory if both of the following requirements are met:

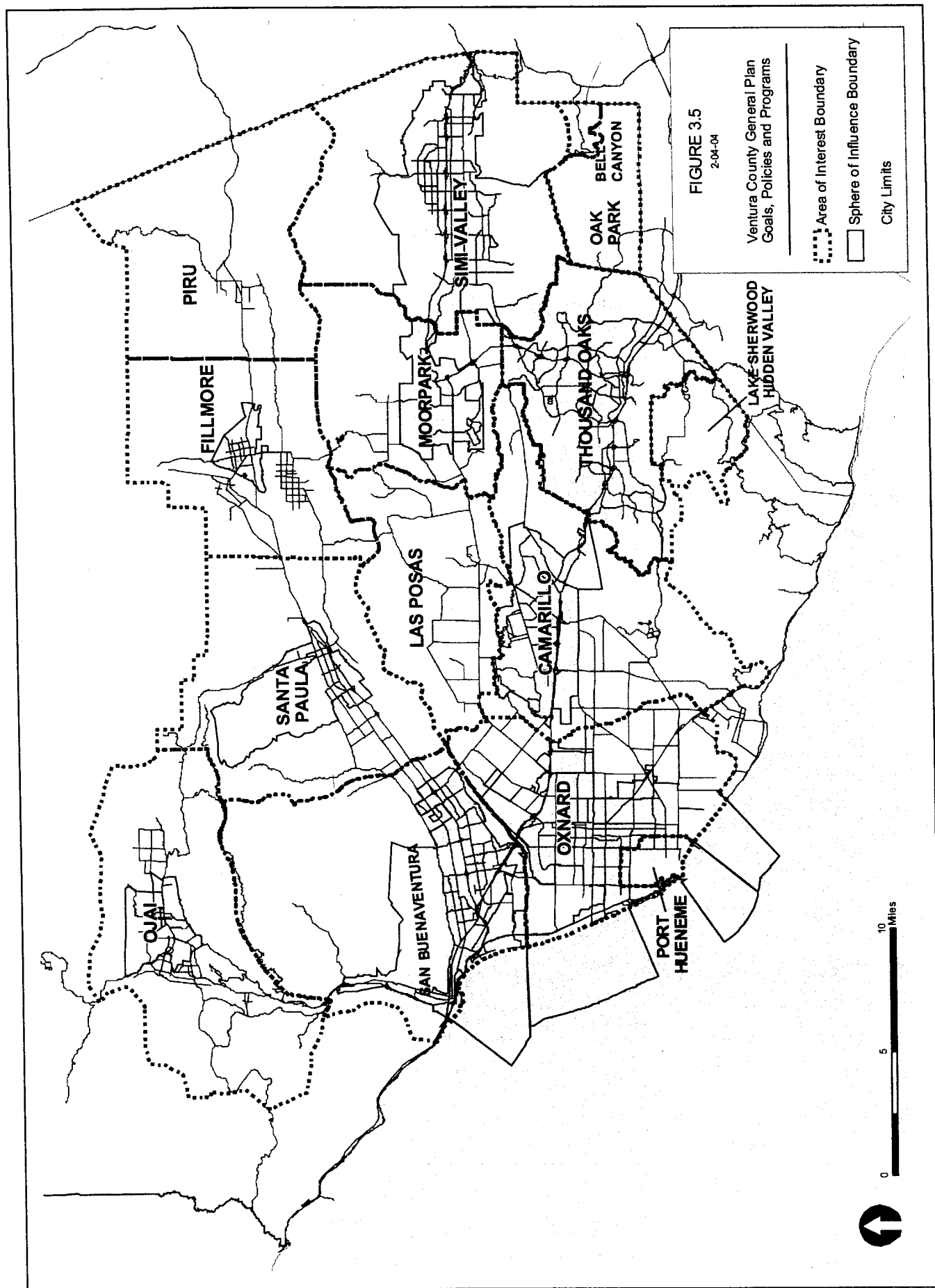
(1) The entity applying for the contract approval has provided the commission with documentation of a threat to the health and safety of the public or the affected residents.

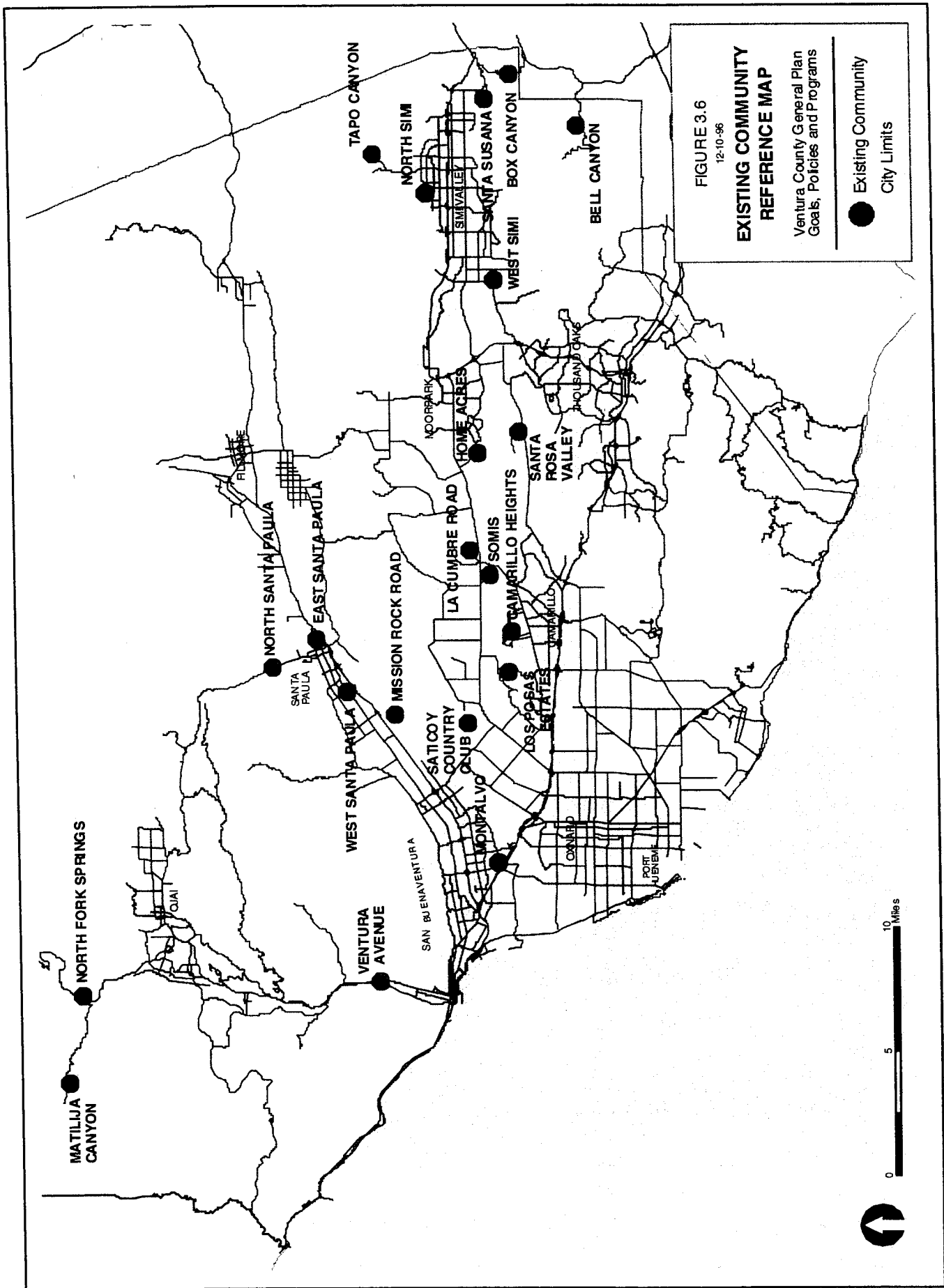
(2) The commission has notified any alternate service provider, including any water corporation as defined in Section 241 of the Public Utilities Code, or sewer system corporation as defined in Section 230.6 of the Public Utilities Code, that has filed a map and a statement of its service capabilities with the commission.

(d) The executive officer, within 30 days of receipt of a request for approval by a city or district of a contract to extend services outside its jurisdictional boundary, shall determine whether the request is complete and acceptable for filing or whether the request is incomplete. If a request is determined not to be complete, the executive officer shall immediately transmit that determination to the requester, specifying those parts of the request that are incomplete and the manner in which they can be made complete. When the request is deemed complete, the executive officer shall place the request on the agenda of the next commission meeting for which adequate notice can be given but not more than 90 days from the date that the request is deemed complete, unless the commission has delegated approval of those requests to the executive officer. The commission or executive officer shall approve, disapprove, or approve with conditions the contract for extended services. If the contract is disapproved or approved with conditions, the applicant may request reconsideration, citing the reasons for reconsideration.

(e) This section does not apply to contracts or agreements solely involving two or more public agencies where the public service to be provided is an alternative to, or substitute for, public services already being provided by an existing public service provider and where the level of service to be provided is consistent with the level of service contemplated by the existing service provider. This section does not apply to contracts for the transfer of nonpotable or nontreated water. This section does not apply to contracts or agreements solely involving the provision of surplus water to agricultural lands and facilities, including, but not limited to, incidental residential structures, for projects that serve conservation purposes or that directly support agricultural industries. However, prior to extending surplus water service to any project that will support or induce development, the city or district shall first request and receive written approval from the commission in the affected county. This section does not apply to an extended service that a city or district was providing on or before January 1, 2001. This section does not apply to a local publicly owned electric utility, as defined by Section 9604 of the Public Utilities Code, providing electric services that do not involve the acquisition, construction, or installation of electric distribution facilities by the local publicly owned electric utility, outside of the utility's jurisdictional boundaries.







From: GSLassoc@aol.com [mailto:GSLassoc@aol.com]

Sent: Wednesday, October 11, 2006 1:27 PM

To: Frank Wen; Joseph Carreras; Ma'Ayn Johnson

Cc: tsato@anaheim.net; mmccann@ci.santa-ana.ca.us; smartin@fullerton.edu; Ddiep@fullerton.edu; annabelcook@earthlink.net; acook@occities.org; dwilberg@cityofmissionviejo.org;

CWilson@cityofmissionviejo.org; ELister@cityofmissionviejo.org

Subject: Ideal Vacancy Rate

Joe and Frank~

I am currently reviewing the two reports that are agendized tomorrow for discussion at the RHNA subcommittee meeting: the 9/28/2006 AB2158 Housing Market Demand Factor (p. 62) and the 10/12/2006 Guidance on Application of a Housing Cost Factor (p. 54), in addition to Joe Carrera's 10/10/06 email to Tracy Sato and the 5/27/2005 SCAG letter to HCD, Attachment IV, SCAG Vacancy Rates.

On the ideal vacancy rate factor, the staff report identifies different options. Further, page 63 of the packet states that the ideal effective vacancy rate adjustment would not affect the forecast of household growth.

Page 54 of the agenda packet identifies an ideal vacancy rate ranging from 2.7% (the factor that would be applied to all jurisdictions using the Census 2000 weighted RHNA vacancy rate factor for the SCAG region) to 3 or 3.5%.

Question #1: The staff report does not identify which of these percentages is being recommended; further, based on discussions with Frank Wen on 10/10/2006, is it correct to state that only the 2.7% factor would not affect the forecast of household growth, as referenced on page 63 of the agenda packet, but the 3 or 3.5% factors would affect and cause for re-adjustment the household growth numbers for the Integrated Forecast?

Question #2: The SCAG letter to HCD identifies a different recommendation for use of a vacancy rate, specifically, a combined vacancy rate of 3.5% as the low, and a 4.2% as the high, with specific individual rates for the renter and owner. Does this mean that even if SCAG CEHD and Regional Council went with a 2.7% vacancy rate factor for an ideal effective vacancy rate, which corresponds to a parity with the regional household forecasts, that HCD could in fact rely upon the May 2005 letter and use the SCAG-recommended vacancy rates which are higher? And how would the recommended rates in the HCD letter affect the Regional Forecast for households?

Question #3: When SCAG converted its 2007 Integrated Growth Forecast Household numbers to the Housing Unit numbers at the countywide level, did not that use a vacancy rate adjustment to derive at the housing unit numbers? For example, did the Orange County numbers use the Orange County vacancy rate from the 2000 Census for the forecast years to translate households to housing units, or another factor?

Further, when the housing units were then broken down to the individual jurisdictions within a subregion, which the jurisdictions will be soon receiving with the Compass Blueprint package, can you clarify which vacancy rate was used to derive the household data to the housing units data at the jurisdictional level? Most jurisdictions, for example, have an individual vacancy rate that is different than the Orange County total vacancy rate. What factor was used in the jurisdiction-specific tables?

Appreciate greatly any clarification to my questions. Thanks so much.

Gail

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GSLassoc@aol.com

Comment from Tracy Soto dated Oct. 12, 2006

Frank,

Thank you so much for these clarifications!

Tracy

From: Frank Wen [mailto:WEN@scag.ca.gov]
Sent: Wednesday, October 11, 2006 11:52 PM
To: Tracy Sato; gssassoc@aol.com; annabelcook@earthlink.net
Cc: Lynn Harris; Joseph Carreras; Joanna Africa; Ma'Ayn Johnson
Subject: RE: CEHD Subcommittee on RHNA Policy Issues: Question on Item 6.1.1

Please see below:

From: Joseph Carreras
Sent: Wed 10/11/2006 10:37 PM
To: Frank Wen
Subject: FW: CEHD Subcommittee on RHNA Policy Issues: Question on Item 6.1.1

More questions...

From: Tracy Sato [mailto:TSato@anaheim.net]
Sent: Wed 10/11/2006 6:33 PM
To: Ma'Ayn Johnson; Joseph Carreras
Cc: Lynn Harris; Jonathan Borrego; gssassoc@aol.com; McCann, Melanie; Diep, Deborah; annabelcook@earthlink.net
Subject: CEHD Subcommittee on RHNA Policy Issues: Question on Item 6.1.1

Ma'Ayn and Joe,

Item 6.1.1 is a policy to apply a Housing Cost factor to the RHNA. Could you please clarify approaches #2 and #3 and how it would be applied and what the formula would be? Specifically, could you respond to the following questions:

1. Regarding approach #2, how is a high housing cost jurisdiction determined? Is it defined through vacancy rates with the assumption that high housing cost jurisdictions would have a low vacancy rate because not enough housing is provided as implied by that statement of increase in low vacancy, high housing cost communities? It does not appear that the table referenced was included in the agenda, but having looked at the vacancy rates I calculated (based on the HCD vacancy formula Gail and Frank Wen discussed), I am not sure that this approach would make sense. Other policy issues play into the vacancy discussion based on the desirability of a location, such as how schools play into the desirability of a community thus increasing housing costs and lowering vacancy rates; if a community has lower cost housing, it may actually have lower vacancy rates because the housing is simply more affordable and thus more desirable; and more. Further, in extremely high cost cities, vacancy rates can be fairly high - even over 3.5% - simply because housing does have a high cost and therefore have a high vacancy rate. The data do not demonstrate that there is always a direct correlation between vacancy rates and housing cost. This question also applies to item 6.1.2.

Translating AB 2158 factors into actual application and allocate housing needs across jurisdiction should work something like following:

1. An initial allocation of household growth based on trends and local growth perspective

2. High housing costs burdens represented by housing prices (e.g. using the 2005 housing price for each of the scag jurisdictions) and based on which to calculate th share of construction needs based on the inverse of housing prices
3. High housing costs burdens represented by the number of affordable units, the places with the least number of affordable units should get assign the largest number of total units.

Finally the fianlly allocation of total construction needs will derive based on some weighted average of above three shares across all local jurisdictions.

Above approaches/methodology which are currently explored by other MPOs are not recommended by staff. Staff recommendation is based on following rationales:

1. On the one hand, there is strong correlation (negative) between vacancy rate and housing costs burdens as indicated by housing prices. Of course, this is not perfect for every cities, however, staff conducted statistical analysis, and the results show that the negative correlation is strong ($r=-0.63$) and it is statistically significant. Thus, staff recommend using the vacancy rates to adjusted the housing stock and construction needs such that housing costs burdens and high housing prices could be moved toward the right direction.

2. On the other hand, since a large part of housing costs burdens can be attributed to the lack of affordable units. Thus staff propose that moving toward a housing allocation by income using each jurisdiction's own median household income would result in all jurisdiction with a similar allocation of affordable units. As such, the approach will also address the requirements of the law to reduce the concentration of low income households in places where the concentration are already high!

The only issue needs to be addressed under this approach is that there will be reallocation of about 9,000 units of affordable units proportionally to all jurisdictions because using city MHI will result in 9,000 less units than the affordable units from using the county MHI.

Nevertheless, staff think above approaches could address the policy concerns related to high housing costs burdens and concentration of low income household, yet they keep 95% of the initial household growth distribution provided from the Integrated Growth Forecasts.

2. Regarding approach #3, how is this applied to jurisdictions? Is this saying that a jurisdictions allocation would be based on their median income and the resulting percentages indicated in the table or that the percentages would be the basis for the initial adjustment? So to take Anaheim as an example: If I follow the formula described - Anaheim has a median income of \$47,122 and a resulting very low income percentage of 20.3%. Is the proposal that if Anaheim gets an allocation of 10,000 units, 20.3% or 203 of them would then need to be very low income.

Yes*. 203 (very low), 186 (low), 200 (moderate), 411 (above moderate) vs. the initial allocation (using county median household income)

275 (very low), 222 (low), 205 (moderate), 298 (above moderate) and then it is up to final policy adjustment and decision that how close can be moved to county allocation of:

215 (very low), 177 (low), 199 (moderate), 409 (above moderate)

* Need to do a final allocation of about 9000 units for affordadle units across the region.

3. Regarding approach #3, would there then be a need to move to the County percentage or does this policy imply that the percentage be maintained? Under the county formula, \$58,820, the City has a resulting very low income percentage of 27.5% but would possibly receive some percentage between the County percent of 21.5% and 27.5% or a reduced percentage below the 21.5%, or as has been proposed by some CEHD members 0% or some other reduced percentage because the City is already considered impacted. (If this is the question to be debated by the 6.1.2 or 6.1.3, please disregard.)

Please see responses under #2 above.

4. Regarding approach #3, does staff's recommendation mean, when it says that this obviates any need for further fair share discussions, that there would not be a need to try to reach the County median and that this methodology would reduce the impacts on already impacted cities? I think that a policy question

should be clear regarding what is being recommended. The question is does this reduce the impacts on already impacted cities considering, from your example, that the high income city percentage moves from 15% to 20% but the more modest income city, while reduced from 33% to 25% still has a higher percentage of very low income than the higher income city - again, if this is the question to be responded to for 6.1.2 or 6.1.3, please disregard.

How fast and how close the adjustment toward the county median will be determined by the policy discussion process and consensus.

Finally, I do not understand Item 6.1.2. Option two refers to an employment/population/housing adjustment but that is not what is discussed in option one, which discusses an idealized effective vacancy rate, at least to my understanding. Could you please clarify with an example, what is meant by option 1?

It will be discussed in the meeting.

I appreciate any clarification regarding the questions above.

I hope above help to clarify your questions, let me know if I can provide further assistance. thanks.

Thank you,
Tracy Sato

Tracy Sato, AICP
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